

## NorthAnnaRAIsPEm Resource

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**From:** Patel, Chandu  
**Sent:** Friday, March 30, 2012 2:10 PM  
**To:** 'na3raidommailbox@dom.com'  
**Cc:** Weisman, Robert; NorthAnnaRAIsPEm Resource; Musico, Bruce; Galvin, Dennis  
**Subject:** RAI Letter No. 98, RAI 6341, FSAR Section 14.3.10, North Anna 3 COLA (52-017)  
**Attachments:** RAI Letter 98 RAI 6341.doc

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a Combined License Application for North Anna, Unit 3, pursuant to Title 10 of the *Code of Regulations*, Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this COLA.

The NRC staff has identified that additional information is needed to continue portions of the review and a Request for Additional Information (RAI), is enclosed. To support the review schedule, Dominion is requested to respond within 30 days of the date of this request. If the RAI response involves changes to the application documentation, Dominion is requested to include the associated revised documentation with the response.

Sincerely,  
Chandu Patel  
Lead Project Manager for NA3 COLA

**Hearing Identifier:** NorthAnna3\_eRAI  
**Email Number:** 32

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**Subject:** RAI Letter No. 98, RAI 6341, FSAR Section 14.3.10, North Anna 3 COLA (52-017)  
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Letter No. 98  
3/30/2012  
North Anna, Unit 3  
Dominion  
Docket No. 52-017

SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria  
Application Section: Part 10

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

Request for Additional Information No. 6341

14.03.10-4

Part 10, Tier 1/ITAAC - COL application Part 10, "Tier 1/ITAAC" (Revision 4, December 2011), includes emergency planning (EP) ITAAC in Table B-1, "ITAAC for Emergency Planning." Please address the following related questions:

- a. In ITAAC 1.1, Inspections, Tests, Analyses 1.1, and Acceptance Criteria 1.1.1 and 1.1.2, delete the reference to "Section 5". There is no Section 5 in Appendix 1, and the reference appears to be to COLA Part 5 (Emergency Plan). If the revisions are not appropriate, explain why.
- b. In ITAAC Section 3.0 (Emergency Communications), the numbering for the second EP Program Element (page 10-47) appears incorrect, in that it should be "3.2", rather than "3.1", for the EP Program Element associated with NUREG-0654/FEMA-REP-1 evaluation criterion [F.1.f]. In addition, the related numbering under the columns entitled "Inspections, Tests, Analyses," and "Acceptance Criteria" should be "3.2.1" and "3.2.2", rather than "3.1.1" and "3.1.2". Either revise these numbers or explain why the revisions are not appropriate.
- c. ITAAC 4.1 addresses the existing Emergency News Center (ENC). The acceptance criterion states that "[t]he Emergency News Center has space for a limited number of the news media." This acceptance criterion is unacceptable because the "limited number" is unspecified (i.e., it is not an objective criterion that an inspector can confirm is met). In addition, ITAAC 4.1 is unnecessary because the ENC currently exists and supports Units 1 and 2, consistent with the current site emergency plan. As such, an additional evaluation of the ENC's adequacy, as part of the Unit 3 licensing, is not required. Subsection I, "Areas of Review," of NUREG-0800 Section 13.3 states in part that "[i]n general, if an application is for an additional reactor at an operating reactor site, and the application proposes to incorporate and extend elements of the existing emergency planning program to the new reactor (including by reference), those existing elements should be considered acceptable and adequate." Therefore, either delete all of ITAAC 4.0 in Table B-1 (renumbering the remaining ITAAC, as appropriate), or revise acceptance criterion 4.1 to replace "limited number" with the specific number of news media that the ENC has space for.
- d. In ITAAC 5.1, change "operations support center" to "operational support center" - consistent with the Emergency Plan designation. In addition, (1) change "EP Element" to "EP Program Element" in ITAAC 5.1.1 (Inspections, Tests, Analyses column), and (2) change Acceptance Criteria number "5.1.1.2" to "5.1.2.2".

e. ITAAC 5.1 includes references to two US-APWR DCD Tier 1 tables (i.e., Tables 2.5.4-2 and 2.10-1). In contrast, the comparable ITAAC 8.1 of the Comanche Peak COL application (Part 10, Table B-1, Revision 2) identifies four tables (i.e., Tables 2.10-1, 2.7.5.4-3, 2.7.6.10-1, and 2.5.4-2). The staff reviewed the two extra tables (i.e., Tables 2.7.5.4-3 and 2.7.6.10-1), including the identified DCD design commitments (DCs), and believes that these are also relevant to North Anna ITAAC 5.1. Therefore, either revise ITAAC 5.1 to include bullets for "Table 2.7.5.4-3, DC #8" and Table 2.7.6.10-1, DCs #1, 2, 3," or explain why a revision is not appropriate.

f. In ITAAC 5.2, acceptance criterion 5.2.3 does not identify what data/parameters are available in the Emergency Operations Facility (EOF). Section H.2, "Emergency Operations Facility," of COL application Part 5 (Emergency Plan) states in part that "[d]isplay capability of the technical data system in the EOF includes a workstation that, at minimum, is capable of displaying the parameters that are required of an SPDS [Safety Parameter Display System]." In comparison, acceptance criterion 5.1.1 includes a bulleted reference to US-APWR DCD Tier 1 Table 2.5.4-2, Design Commitment (DC) #1, which references available (TSC) display variables for information systems important to safety. In NUREG-0800 Table 14.3.10-1 (Generic EP ITAAC), acceptance criterion 8.2.4 includes the bracketed statement: "[The COL applicant will identify specific capabilities.]" In addition, see NUREG-0696, Section 4.8, [EOF] "Technical Data and Data System." See also, Vogtle Unit 3 ITAAC (acceptance criterion) 5.2.2, which states: "The plant parameters listed in Table Annex V2 H-1, *Post Accident Monitoring Values*, can be retrieved and displayed in the EOF." Therefore, either revise ITAAC 5.2.3 to include the identification of appropriate data/parameters/variables that are available in the EOF - possibly, including a reference to DCD Table 2.5.4-2, DC #1 (if appropriate) - or explain why a revision is not appropriate.

g. In ITAAC Section 6.0 (Accident Assessment), change "EALs parameters" to "EAL parameters" in acceptance criterion 6.1.A.1. In addition, change "verify the availability of the following meteorological data is available:" to "verify the availability of the following meteorological data:" in Inspections, Tests, Analyses column number 6.4. Also, delete the reference to "Section 5" in acceptance criterion 6.1 (first paragraph). There is no Section 5 in Appendix 1, and the reference appears to be to COLA Part 5 (Emergency Plan). If the revisions are not appropriate, explain why.

h. In ITAAC 8.1, acceptance criterion 8.1.1.C.1.a does not include the time it will take for the transition of command and control from the control room to the TSC. Section H.1, "On-Site Emergency Response Facilities," of COL application Part 5 (Emergency Plan) states in part that "[t]he TSC and OSC are provided to support emergency operations consistent with the guidance provided in NUREG-0737, Supplement 1." The TSC activation time is addressed NUREG-0737 (Supplement 1) Subsection 8.2.1.j, which states in part that [The TSC will be:] "[s]taffed by sufficient technical, engineering, and senior designated licensee officials to provide needed support, and be fully operational within approximately 1 hour after activation." See also, Vogtle Unit 3 ITAAC (acceptance criterion) 8.1.1.C.1.a, which states: "Command and control is demonstrated by the control room in the early phases of the emergency and the technical support center (TSC) within 60 minutes from TSC activation." Therefore, either revise North Anna ITAAC acceptance criterion 8.1.1.C.1.a to include the time it will take the TSC to demonstrate command and control, or explain why a revision is not appropriate.